

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

_____)	
LR TRUST,)	
)	Civil Action No. 2:14-cv-00612
Plaintiff,)	
)	
v.)	JUDGE MICHAEL H. WATSON
)	
NICHOLAS DiPAOLO <i>et al.</i> ,)	MAGISTRATE JUDGE KING
)	
Defendants.)	
_____)	

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT
AND ENTRY OF ACCOMPANYING ORDER FOR NOTICE
AND SCHEDULING OF HEARING ON SETTLEMENT**

PLEASE TAKE NOTICE that Plaintiff LR Trust, respectfully moves, on a date convenient to the Court, for an order: (i) granting preliminary approval of the proposed Settlement in the above-captioned shareholder derivative action as embodied in the Stipulation of Settlement; (ii) conditionally certifying a non-opt out class for settlement purposes and appointing class representatives and class counsel; (iii) approving the proposed form and method for disseminating notice of the Settlement to the Settlement Class; and (iv) setting a hearing for final approval of the Settlement. This motion is based upon the accompanying memorandum of law attached hereto as Exhibit 1, the Stipulation of Settlement and the accompanying exhibits attached therewith, as well as all prior proceedings held in this action, and other such matters and arguments as the Court may consider.

DATED: September 25, 2015

Respectfully submitted,

/s/ John C. Camillus
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CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2015, I electronically filed the foregoing paper(s) with the Clerk of the Court using the ECF system, which will send notification of such filing to all ECF participants.

/s/ John C. Camillus